

1  
2  
3  
4  
5  
6 **IN THE UNITED STATES DISTRICT COURT**  
7 **FOR THE DISTRICT OF ARIZONA**

8  
9 IN RE BARD IVC FILTERS PRODUCTS  
10 LIABILITY LITIGATION

No. 2:15-MD-02641-PHX-DGC

11 This Document Applies to case listed on  
12 the Exhibit attached hereto.

**STIPULATION OF DISMISSAL  
WITH PREJUDICE**

13  
14 COMES NOW, Plaintiff whose case is listed on Exhibit A attached hereto  
15 (“Plaintiff”) and Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc.  
16 (“Defendants”), file this Stipulation of Dismissal with Prejudice, and in support thereof,  
17 respectfully show the Court as follows:  
18

19 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff and  
20 Defendants hereby stipulate to the dismissal of the case listed on Exhibit A with prejudice  
21 to the re-filing of same. Plaintiff and Defendants further stipulate that they are to bear their  
22 own costs.  
23

24 WHEREFORE, PREMISES CONSIDERED, Plaintiff and Defendants hereby  
25 respectfully request that the Court dismiss the case listed on Exhibit A in its entirety with  
26 prejudice to the re-filing of same and order that these parties are to bear their own costs.  
27

28 Respectfully submitted this 10<sup>th</sup> day of March, 2021.

1 s/ Denman H. Heard

2 Denman H. Heard

3 HEARD LAW FIRM, PLLC

2925 Richmond Avenue, Suite 1550

Houston, Texas 77098

4 Phone: (713) 665-1100

5 Fax: (713) 751-9100

[Denman@HeardLawFirm.com](mailto:Denman@HeardLawFirm.com)

6  
7 *Attorneys for Plaintiff*

s/Richard B. North, Jr.

Richard B. North, Jr.

[richard.north@nelsonmullins.com](mailto:richard.north@nelsonmullins.com)

NELSON MULLINS RILEY &

SCARBOROUGH LLP

201 17th St. NW, Ste. 1700

Atlanta, GA 30363

P: 404.322.6000

F: 404.332.6397

*Attorneys for Defendants C. R. Bard, Inc.  
and Bard Peripheral Vascular Inc.*

8  
9  
10 **CERTIFICATE OF SERVICE**

11 I hereby certify that on March 10, 2021, I electronically filed the foregoing  
12 document with the Clerk of the Court using the CM/ECF system which will send  
13 notification of such filing to the CM/ECF participants registered to receive service in this  
14 MDL.  
15

16  
17  
18 /s/ Denman H. Heard